

ATTACHMENT I TO JPN-86-16

PROPOSED TECHNICAL SPECIFICATION CHANGES  
REGARDING RESERVE POWER TO EMERGENCY BUSES  
PTS-85-15

NEW YORK POWER AUTHORITY  
JAMES A. FITZPATRICK NUCLEAR POWER PLANT  
DOCKET NO. 50-333  
DPR - 59

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## 3.9 (cont'd)

3. From and after the time that one of the Emergency Diesel Generator Systems is made or found to be inoperable, continued reactor operation is permissible for a period not to exceed 7 days provided that the two incoming power sources are available and that the remaining Diesel Generator System is operable. At the end of the 7-day period, the reactor shall be placed in a cold condition within 24 hours, unless one or both diesel generator systems are made operable sooner.
4. When both Emergency Diesel Generator Systems are made or found to be inoperable, a reactor shutdown shall be initiated within two hours and the reactor placed in a cold condition within 24 hours after initiation of shutdown.

## 4.9 (cont'd)

3. The emergency diesel generator system instrumentation shall be checked during the monthly generator test.
4. Once each operating cycle, the conditions under which the Emergency Diesel Generator System is required will be simulated to demonstrate that the pair of diesel generators will start, accelerate, force parallel, and accept the emergency loads in the prescribed sequence.
5. Once within one hour and at least once per twenty-four hours thereafter while the reactor is being operated in accordance with Specifications 3.9.B.1, 3.9.B.2, and 3.9.B.3 the availability of the operable Emergency Diesel Generators shall be demonstrated by manual starting and force paralleling where applicable.

ATTACHMENT II TO JPN-86-16

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## Section I - Description of the Change

The proposed change to the Technical Specifications is shown in Attachment I to the Application for Amendment. This change occurs in Section 3.9.A.3 (page 217). The proposed change would delete the requirement to disconnect an emergency bus from the normal power source and connect it to the reserve power source, when its associated Emergency Diesel Generator system is inoperable.

## Section II - Purpose of the Change

This change has been proposed because the requirement to manually transfer to reserve power is unnecessary and may, under some circumstances, degrade plant safety. As described in FSAR Section 8.5, automatic transfer of power supply is provided for equipment required for a safeguard function. The transfer equipment is designed so that the normal source breaker or contactor must open before the alternate source breaker or contactor can close, and the alternate source breaker or contactor will not close if an overload condition exists. The power transfer equipment is designed to meet single failure criteria. Automatic fast transfer of power supply is provided from the normal to reserve source. Automatic residual transfer takes place either after an unsuccessful fast transfer, or when the nature of the disturbance will not allow a fast transfer. In the unlikely event that neither automatic fast transfer nor automatic residual transfer takes place, a manual transfer can still be made.

The requirement to manually transfer to reserve power when an Emergency Diesel Generator system is inoperable may degrade plant safety since it requires manual transfer to reserve power even when the normal power source is available. This is an unnecessary operator action. In addition, if the Emergency Diesel Generator System is made operable within 7 days, another manual transfer is then required to return to the normal power source. During the evolution of manually transferring power, it is necessary to "parallel" the two sources of power for a period of time. During this period, the large phase angle which frequently occurs results in high currents which may cause a breaker trip and result in loss of power and reactor scram. A reactor scram resulting from the manual transfer action occurred at the FitzPatrick Plant and is described in Licensee Event Report 85-019-00 dated August 16, 1985. The requirement that the two incoming power sources be available and the remaining Diesel Generator System is operable is sufficient to ensure that power is available in the event that one of the Emergency Diesel Generator systems is inoperable.

## Section III - Impact of the Change

The proposed change does not change any system or subsystem and will not alter the conclusions of either the FSAR or SER accident analyses.

Based on the discussions in Section II, operation of the Fitzpatrick plant in accordance with the proposed amendment would not:

- (1) involve a significant increase in the probability of an accident because there is no change in the number of power sources available but only in how they are connected; or
- (2) create the possibility of a new or different kind of accident from any accident previously evaluated because no new mode of failure is introduced; or
- (3) involve a significant reduction in margin of safety because the elimination of an unnecessary operator action would enhance the safe operation of the plant.

#### Section IV - Implementation of the Changes

Implementation of the changes, as proposed, will not impact the ALARA or fire protection programs at FitzPatrick, nor will the changes impact the environment.

#### Section V - Conclusion

The incorporation of these changes:

- a) Will not change the probability nor the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report;
- b) Will not increase the possibility of an accident or malfunction of different type than any evaluated previously in the Safety Analysis Report;
- c) Will not reduce the margin of safety as defined in the basis for any Technical Specifications;
- d) does not constitute an unreviewed safety question as defined in 10 CFR 50.59; and
- e) Involves no significant hazards considerations, as defined in 10 CFR 50.92.

#### Section VI - References

- 1) James A. FitzPatrick Nuclear Power Plant Final Safety Analysis Report (FSAR), Rev 2, July 1984, Section 8.5.
- 2) James A. FitzPatrick Nuclear Power Plant Safety Evaluation Report (SER).